

Yolanda Lowe

UNITED STATES BANKRUPTCY COURT FOR THE
NORTHERN DISTRICT OF OHIO

IN RE:) CASE NUMBER: **22-10571**
)
MATTHEW M. MOTIL) **Chapter 7**
)
)
)
Debtor)
)
)
)
) **APPLICATION OF TRUSTEE FOR**
) **AUTHORIZATION TO EMPLOY**
) **COUNSEL FOR THE ESTATE**

The undersigned Trustee respectfully represents to the Court that:

1. He is the duly appointed Trustee in the within proceedings.
2. There appears to be property belonging to the Estate which must be administered and disposed of by the Trustee: Items of jewelry including a watch.
3. The Trustee requests the appointment of Virgil E. Brown, Jr., to serve as Counsel for the Estate.
4. It is necessary that he employ counsel to render services consisting of one or more of the following:
 - a. Preparation, execution and filing of pleading, motions, documents and attendance at hearings;
 - b. Other related, necessary or incidental services.
5. Virgil E. Brown, Jr., shall receive \$300.00 per hour of the gross receipts received subject to approval of the Court.
6. The Estate has interest in items of jewelry including a watch. There is equity in the items of jewelry including a watch of approximately \$8,000.00. The Estate needs to gain possession items of jewelry including a watch or reach an agreement with Debtor to pay the Estate for the Estate's interest.
7. The legal work includes preparing and filing Motions and other pleadings to protect the Estate's Interest, secure the turnover of the items of jewelry including a watch or value thereof. There may be other pleadings or proceedings that may become necessary or proper to protect the Estate's interest and property.
8. Trustee expects the legal work required includes pursuing Debtor to collect the balance, or gaining possession of the items of jewelry including a watch and selling it, will cost about \$300.00 - \$600.00.

NOTICE

Pursuant to Local Bankruptcy Rule 9013-1, any objection to this application must be filed within 14 days from the date of service as set forth on the certificate of service. If no response or objection is timely filed, the Court is authorized to grant the relief requested without further notice.

WHEREFORE, the Trustee prays for authority to employ Virgil E. Brown, Jr., to act as Counsel in this case and that his appointment should be deemed retroactive to the date of the filing of this Application and he shall be paid \$300.00 per hour out of the sum collected.

/s/ Virgil E. Brown, Jr.

Virgil E. Brown, Jr. (0003675)
4070 Mayfield Road
Cleveland, Ohio 44121
(216) 851-3304
(216) 851-2900 Fax
virgil@vebtrustee.com

CERTIFICATE OF SERVICE

I certify that on Oct 14, 2022, a true and correct copy of the foregoing Application was served via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

U.S. Trustee at registeredaddress@doj.gov

And by regular U. S. mail, postage prepaid on

/s/ Virgil E. Brown, Jr.

Virgil E. Brown, Jr. (0003675)
Trustee
4070 Mayfield Road
Cleveland, Ohio 44121
(216) 851-3304
(216) 851-2900 Fax
virgil@vebtrustee.com

UNITED STATES BANKRUPTCY COURT FOR THE
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The undersigned being first duly sworn, deposes and says that:

1. He makes the Verified statement pursuant to the provisions of 11 U. S. C. Section 327(a) and (c) of the Bankruptcy Code regarding employment of professional persons by the Trustee, and in light of the restrictions imposed thereon by Bankruptcy Rule 210(a) and 5002.
2. This Verified statement supplements the disclosures contained in and accompanying the Application of the Trustee for Authority to Employ Counsel filed with this Court.
3. This Verified statement is to affirm to this Court that neither she nor any person with whom he is associated is a relative by blood or marriage of any Bankruptcy Judge of the Northern District of Ohio; and that he, nor any member of his firm, is not now, nor has ever been, so connected with any such Judge as to render his firm's appointment, or the Court's approval of his firm's employment, as Counsel in the above-captioned matter improper.
4. This Verified statement is to further affirm to this Court that neither Affiant, nor any person with whom he is associated, is connected with the debtor, creditors, or any other party in interest or their respective attorneys and accountants, the United States Trustee, or any person employed in the office of the United States Trustee.
5. This verified statement is to further affirm to this Court that the Affiant acknowledges that he understands and will abide by guidelines for compensation and expense reimbursement of professionals.
6. Further, this Verified statement is to fully disclosed to the Court matters that might be considered by any party to create any issue or claim of conflict or lack of being a disinterested party, as relates to his firm in this case and to disclose to the Court that the only fees and expenses to be paid to the Applicant shall be those allowed pursuant to order of this Court, with none of such fees or expenses to be shared with third parties other than the members and associates of his firm.

Sworn to before me and
Subscribed in my presence on

Subscribed in my presence
OCT 11, 2022, 2022

Notary Public—Commission State of Ohio

Attorney at Law—

My Commission does not expire

/s/ Virgil E. Brown, Jr.
4070 Mayfield Road
Cleveland, Ohio 4412

JOANNE BROWN
Attorney at Law

Notary State of Ohio
My Commission Does Not Expire
ORC147.03

